

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
No. 25-cv-22896-KMW**

FRIENDS OF THE EVERGLADES, INC., et al.,

Plaintiffs,

v.

KRISTI NOEM, et al.,

Defendants.

**DEFENDANT FDEM'S NOTICE OF SUPPLEMENTAL DECLARATION**

Defendant FDEM respectfully submits this notice containing a supplemental declaration from Ian Gadea-Guidicelli. As the declaration explains, miscommunication by FDEM's counsel led Mr. Gadea-Guidicelli to understand that Exhibits 5 and 11 of his August 11 declaration would contain a series of images taken by him of the fence line surrounding the airport. In preparing Mr. Gadea-Guidicelli's declaration for filing, counsel for FDEM erroneously attached images that were not taken by Mr. Gadea-Guidicelli, but which do accurately reflect the airport's fence line based on his experience at the TNT site.

Dated: August 13, 2025

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Respectfully submitted,

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*Counsel for Kevin Guthrie, in his official capacity as Executive Director of the Florida Division of Emergency Management*

#### **CERTIFICATE OF SERVICE**

I hereby certify that on August 13, 2025, the foregoing was filed with the Clerk of Court using CM/ECF, which will serve a Notice of Electronic Filing on all counsel of record.

s/ Jesse Panuccio  
Jesse Panuccio